

EXHIBIT “**B**”

EXHIBIT B**Settlement Payment Structure – *Suarez, et. al. v. Brasserie Felix, Inc., et. al.***

DATE	Payment schedule	Distrib. to MIGUEL ANGEL SUAREZ	Distrib. to MIGUEL CIELO RAMOS	Distrib. to GERARDO IXEHUATL HERNANDEZ	Distrib. GUSTAVO JACOBO PERALTA
10 days after court approval	\$400,000.00	\$13,330.00	\$10,130.10	\$23,465.30	\$25,322.56
on or before 6/30/21	\$200,000	\$6,665.00	\$5,065.05	\$11,732.65	\$12,661.28
on or before 10/31/21	\$200,000	\$6,665.00	\$5,065.05	\$11,732.65	\$12,661.28

DATE	Distrib. to JUAN MANUEL CUERVO REYES	Distrib. to CARLOS RANGEL CAMACHO	Distrib. MARCELINO BARRALES RAMOS	Distrib. to NESTOR HERNANDEZ SANCHEZ	Distrib. to LEO DAN ANDRADE HUERTA
10 days after court approval	\$17,600.50	\$24,265.60	\$32,001.80	\$37,340.10	\$14,931.80
on or before 6/30/21	\$8,800.25	\$12,132.80	\$16,000.90	\$18,670.05	\$7,465.90
on or before 10/31/21	\$8,800.25	\$12,132.80	\$16,000.90	\$18,670.05	\$7,465.90

DATE	Distrib. to JOSE GAGUANCELA AUCACAMA	Distrib. To FIDENCIO JUAREZ TECUAPACHO	Distrib. to EFREN ROMERO	Distrib. to attorneys for litigation fees and expenses
10 days after court approval	\$22,940.80	\$16,003.90	\$29,334.20	\$133,333.33
on or before 6/30/21	\$11,470.40	\$8,001.95	\$14,667.10	\$66,666.67
on or before 10/31/21	\$11,470.40	\$8,001.95	\$14,667.10	\$66,666.67